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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 YULIAN CRUZ SANTA CRUZ,
15 Defendant.

Case No. 2:18-cr-372-APG-GWF

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Simon Fanzong Kung, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Raquel Lazo, Assistant Federal Public Defender, counsel for Yulian Cruz Santa Cruz, that
21 the Revocation Hearing currently scheduled on December 18, 2019 at 10:30 am, be vacated and
22 continued to a date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel just learned that Mr. Santa-Cruz was released to ICE custody
25 following his release on this case. Because Mr. Santa-Cruz is a Cuban national and cannot be
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1 deported, it is anticipated that he will eventually be released on an Order of
2 Supervision. However, it is not known how long it will take before he is released.¹

3 2. Defense counsel will need time following Mr. Santa-Cruz' release to meet with
4 him to discuss and review the violations alleged in the petition, some of which include new law
5 violations.

6 3. The defendant is not in custody on this case, but he is in immigration custody.

7 4. The parties agree to the continuance.

8 This is the first request for a continuance of the revocation hearing.

9 DATED this 10th day of December, 2019.

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11 RENE L. VALLADARES
12 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

13 /s/ Raquel Lazo
14 By _____
15 RAQUEL LAZO
Assistant Federal Public Defender

/s/ Simon Fanzong Kung
By _____
SIMON FANZONG KUNG
Assistant United States Attorney

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25 _____
26 ¹ Last time Mr. Santa-Cruz was taken into ICE custody (following his January 12, 2018
release from BOP), he was detained for approximately 9 months.

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 YULIAN CRUZ SANTA CRUZ,

7 Defendant.

Case No. 2:18-cr-372-APG-GWF

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled
11 for Wednesday, December 18, 2019 at 10:30 a.m., be vacated and continued to January 23,
12 2020 at the hour of 9:30 a.m. in courtroom 6C; or to a time and date convenient to the court.

13 DATED this 11th day of December, 2019.

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16 UNITED STATES DISTRICT JUDGE